

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-14074-CANNON/MAYNARD(s)

UNITED STATES OF AMERICA,

vs.

SHANNIMA YUANTRELL SESSION,

**a.k.a. "Shalamar"
a.k.a. "Lean"
a.k.a. "Dreds"
a.k.a. "Rasta"**

Defendant.

/

**GOVERNMENT'S MEMORANDUM AND JOINT PROPOSAL
REGARDING TESTIMONY BY PROBATION OFFICERS**

The United States of America, by and through its undersigned counsel, and after consultation with the defense, hereby submits this memorandum and joint proposal regarding testimony by probation officers in the above-captioned case.

FACTUAL SUMMARY

The government intends to call two probation officers to testify about their interactions and observations while supervising Defendant, including the following: (1) observing and documenting Defendant's residence, including photographing a lock on the exterior of a bedroom door (GX10); (2) their familiarity with Defendant's residence (GX9), and interactions with the individuals present; (3) seizing Defendant's cellular telephone (GX12), which produced evidence of commercial sex trafficking activities; (4) their discussions with Defendant about his income, their efforts to corroborate it, and observations regarding his sources of income; and (5) various

statements Defendant made to them during the course of his supervision, including having previously been involved in running an “escort/prostitution service.”

JOINT PROPOSAL BY PARTIES

After consultation, the parties agree and propose that this Court allow the probation officers to testify that they are “government officials” without reference to probation or their role as probation officers. Additionally, the probation officers will testify that their searches, seizures, observations, and interactions with Defendant and others were all made pursuant to lawful authority. Doing so will allow the officers to testify without revealing Defendant’s criminal history and without causing the jury to question their authority to engage in the above-described conduct.

CONCLUSION

For the reasons stated above, the United States respectfully requests that this Court accept the parties’ joint proposal.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 14, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via Notice of Electronic Filing generated by CM/ECF.

/s/ Justin L. Hoover
Justin L. Hoover
Assistant United States Attorney